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17 **UNITED STATES DISTRICT COURT**  
18 **EASTERN DISTRICT OF CALIFORNIA**

19 LARRY BIEGLER an individual;  
20 ALYSIA BIEGLER, an individual;

21 *Plaintiffs,*

22 vs.

23 NATIONAL GENERAL  
24 INSURANCE COMPANY; and  
25 DOES 1 through 20, inclusive

26 *Defendants.*

CASE NO.: 2:22-CV-00560-MCE-  
DMC

27 **STIPULATION AND ORDER TO**  
28 **CONTINUE CASE DEADLINES**

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**I.****STIPULATION**

The parties to the above-entitled action, by and through their counsel, do hereby stipulate to stay the completion of expert discovery for the limited purpose of awaiting the Court's ruling on Defendant National General's Motion for Summary Judgment.

The continuance of the expert discovery deadline is requested because despite best efforts, the parties are unable to schedule expert depositions prior to the expert discovery deadline of October 31, 2023 due to availability of the witness and counsel. The parties have completed all appropriate expert disclosures prior to their respective deadlines due to the schedules of the experts and counsel.

Moreover, in accordance with the aforementioned stipulated extension, the parties agree to complete expert discovery within sixty (60) days of the Court's ruling on Defendant National General's pending Motion for Summary Judgment.

WHEREAS, the parties agree that the interests of judicial economy, efficiency and convenience of the Court and the parties would be furthered by continuing the dates in the in the case management schedule filed on September 14, 2022 (ECF Dkt. No. 21) by approximately 60 days, as follows:

	<b>Original Deadline</b>	<b>Proposed Deadline (Adding 60 Days)</b>
<b>Expert Discovery Cut off</b>	October 31, 2023	To be completed within 60 days after the Court's ruling on Defendants' pending Motion for Summary Judgment

1 WHEREAS, the parties agree that all other case deadlines, including trial  
2 and motion deadlines, and dates imposed by order, local rules, or otherwise, shall  
3 be reset in accordance with the 90 day continuance requested.

4 NOW, THEREFORE, IT IS AGREED AND STIPULATED that:

5 Alternatively, the parties respectfully request that the Court set a further  
6 case management conference at which new dates may be selected.

7 The parties respectfully request the Court to adopt the foregoing stipulation as  
8 the order of the Court.

9 **IT IS SO STIPULATED.**

10 DATED: October 13, 2023

RICHARDS WILLIS PC

11  
12 By: \_\_\_\_\_



Evan Willis, Esq.

John T. Richards, Esq.

**Attorneys for Plaintiffs, LARRY  
AND ALYSIA BIEGLER**

16 DATED: October 17, 2023

RESNICK & LOUIS P.C.

17  
18 By: \_\_\_\_\_

*/s/ Chris Feasel*

Chris Feasel, Esq.

Attorneys for Defendant

**NATIONAL GENERAL  
INSURANCE and INTEGON  
GENERAL INSURANCE**


**ORDER**

Pursuant to the above stipulation, the Court hereby continues the deadlines set forth the parties Joint Rule 26(f) Report and all other case deadlines by 60 days, in part, as follows:

	Original Deadline	Proposed Deadline (Adding 60 Days)
<b>Expert Discovery Cut off</b>	October 31, 2023	To be completed within 60 days after the Court's ruling on Defendants' pending Motion for Summary Judgment

IT IS SO ORDERED.

Dated: October 20, 2023

  
\_\_\_\_\_  
MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE